

PUBLIC VERSION

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION**

MAXELL, LTD.,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 5:19-cv-00036-RWS

JURY TRIAL DEMANDED

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PLAINTIFF MAXELL, LTD.'S PRETRIAL OBJECTIONS

Pursuant to the Court's Amended Docket Control Order (Dkt. No. 545), Plaintiff Maxell, Ltd. ("Plaintiff" or "Maxell") hereby submits its pretrial objections.

Attached at Exhibit A is a listing of Maxell's objections to Defendant Apple Inc.'s ("Apple") proposed trial exhibits. Attached at Exhibit B is a listing of Maxell's objections to Apple's deposition designations.

As set forth in the Joint Motion to Partially Amend Docket Control Order (D.I. 542), and reflected in the resulting Amended Docket Control Order (D.I. 545), the parties previously agreed to a schedule to further narrow their objections to trial exhibits and deposition designations in advance of an in-person meet and confer scheduled to occur on November 11, 2020. Following such meeting, the parties will jointly notify the Court of the status and proposed steps for resolving any remaining pretrial objections. At this time, Maxell does not anticipate the need for the Court to resolve its pretrial objections at the November 12, 2020 pretrial conference.

In view of the foregoing, Maxell reserves the right to withdraw or amend these objections based on continuing meet and confers between the parties.

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Dated: November 3, 2020

/s/ Jamie B. Beaber

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CERTIFICATE OF SERVICE

The undersigned certifies that all counsel of record who are deemed to have consented to electronic service are being served this 3rd day of November, 2020, with a copy of this document via electronic mail pursuant to Local Rule CV-5(d).

/s/ Jamie B. Beaber
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[REDACTED]